



110 E. 59TH STREET, FLOOR 23
NEW YORK, NY 10022
TEL: (212) 566-1000

March 27, 2023

Application granted.

SO ORDERED.

A handwritten signature in black ink, appearing to read "RA".

Ronnie Abrams, U.S.D.J.
March 28, 2023

Via ECF
The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: ***United States v. Christopher Smith, 22 Cr. 685 (RA)***

Dear Judge Abrams,

As the Court is aware I was assigned to represent Mr. Smith, pursuant to CJA. Mr. Smith is presently before this Court charged with 18 U.S.C. 922(g) (1), Possession of Ammunition by a Felon. Today, however, a superseding indictment was filed that included charges from a separate alleged occurrence. As the Court is also aware, Mr. Smith is intent on a speedy trial.

I have received the exchanged discovery that consists mainly of video surveillance, police documentation, cellular phone material, and audio recordings from the MDC. Complicating the matters is recently exchanged discovery from the incident that is charged in the superseding indictment. Motion practice may be necessary to determine if the new charges should be severed.

Given the quickly approaching trial date, the new charges and my intention to provide Mr. Smith with a zealous and thorough defense at trial, I believe it is necessary to respectfully request the following:

Approval of CJA funds, pursuant to 18 U.S.C. § 3006A, to use the services of a full-time associate, James Healy, from my office (Sullivan Brill, LLP) to assist me in Mr. Smith's representation. Requested services will include client-consultations, counsel visits, document review and assistance with legal research, writing, motion practice, and trial preparation. I propose an associate rate of \$110/hour. I anticipate that, in total, our associate will incur an estimated 100 hours.

Mr. Healy has been a full-time associate of our firm for ten years and has been routinely approved to work on CJA cases throughout this period.

Thank you for your consideration.



110 E. 59TH STREET, FLOOR 23
NEW YORK, NY 10022
TEL: (212) 566-1000

Very Truly Yours,

SULLIVAN|BRILL, LLP

A handwritten signature in black ink that reads "Steven Brill".

By: Steven Brill